

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

GREGORY W. ABBOTT, et al.,

Defendants.

Consolidated Civil Action No.:
5:21-CV-00844-XR

REPUBLICAN NATIONAL COMMITTEE'S NOTICE OF JOINDER

Intervenor-Defendant the Republican National Committee (RNC) respectfully gives notice of its joinder in the Partially Opposed Motion To Intervene Of Harris County Republican Party, Dallas County Republican Party, National Republican Senatorial Committee, And National Republican Congressional Committee (ECF 57) and in the Reply In Support Of Republican Committees' Motion To Intervene (ECF 111).

The RNC is the national committee of the Republican Party as defined by 52 U.S.C. § 30101(14). The RNC manages the Republican Party's business at a national level, including development and promotion of the Party's national platform and fundraising and election strategies; supports Republican candidates for public office at all levels across the country, including those on the ballot in Texas; and assists state and local parties throughout the country, including in Texas, to educate, mobilize, assist, and turn out Republican voters, candidates, election observers, and volunteers. The RNC has made significant contributions and expenditures in support of Republican candidates up and down the ballot and in mobilizing voters in Texas in the past many election cycles and is already doing so again for the 2022 election cycle.

The RNC seeks to intervene in this consolidated action on the same basis as the Republican Committees. The RNC shares the Republican Committees' substantial and particularized interest in this consolidated action; faces the same risk of impairment of that interest if any provision of SB 1 is enjoined now or in the future; is not adequately represented by any existing party; and, at a minimum, should be granted permissive intervention. *See* ECF 57 at 2–12; ECF 111 at 1–10. The RNC therefore asks to be granted intervention with the Republican Committees.

November 15, 2021

/s/ John M. Gore

John M. Gore

E. Stewart Crosland*

Stephen J. Kenny*

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Phone: (202) 879-3939

Fax: (202) 626-1700

jmgore@jonesday.com

scrosland@jonesday.com

skenny@jonesday.com

Counsel for Proposed Intervenor-Defendants

**Pro hac vice applications pending*

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2021, I served counsel of record via the Court's CM/ECF system.

/s/ John M. Gore

Counsel for Proposed Intervenor-Defendants